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November 10, 2023

**Via CM/ECF**

The Honorable Richard M. Gergel  
United States District Court  
for the District of South Carolina  
P.O. Box 835  
Charleston, South Carolina 29402

**Re: Tyco Fire Products LP v. AIU Ins. Co., et al., No. 2:23-cv-02384 (D.S.C.)**

Dear Judge Gergel:

This firm, along with Alston & Bird LLP (attorneys from which are in the process of filing motions to appear *pro hac vice*), represent the AIG Insurers (AIU Insurance Company, American Home Assurance Company, Granite State Insurance Company, Insurance Company of the State of Pennsylvania, National Union Fire Insurance Company of Pittsburgh, Pa., and New Hampshire Insurance Company) in this matter.

Pursuant to the Court's Scheduling Order dated October 30, 2023 (ECF 111), the Insurer Defendants respectfully submit the **Insurer Defendants' Proposed Discovery Case Management Order No. 1**, which is attached as Exhibit A. The Insurer Defendants conferred with Plaintiff Tyco Fire Products LP, ("Tyco"), but were unable to reach an agreement on certain items. As a result, this document indicates where Tyco and the Insurer Defendants were unable to reach an agreement, and, for those items, includes Tyco's position, as well as the Insurer Defendants' response.

We appreciate the Court's continued attention to this matter.

Respectfully,

*s/Christian Stegmaier*

Christian Stegmaier  
(Federal Bar No. 8007)

Attachment

cc: All Counsel of Record (by ECF)